Lessons Learned DOE Records Inventory Process

1. <u>Inventory Objective & Scope</u>

A Records Inventory is conducted to identify the records created by an organization with the objective of organizing them into record series, determining their value and establishing retention and disposition instructions. Guidance for conducting a Records Inventory is contained in the NARA publication "Disposition of Federal Records," Chapter III. For the most part, this information will not be repeated in this paper, but instead it will concentrate on aspects of the records inventory that are not covered in NARA's publication.

The selection of the inventory project organization, the staffing and the funding can tremendously affect the success and rate of completion of the inventory. Additionally, technical considerations applicable to the DOE are not discussed in the NARA publication. These are the issues discussed in this paper.

2. Responsibility for the Inventory

Two different options are available for the responsibility and leadership of a records inventory. These options may be selected depending on the extent of the inventory and on the manpower available to conduct the inventory.

2.1 Centrally Performed

The easiest to manage option was proven to be a records inventory performed under the auspices of the Records Management Organization using that organization's personnel. The organizations to be inventoried may be scheduled based on priorities and significance of the record series. The common records (the site-unique and the administrative records) are handled only once, with quantity and location updates made as the later organizations' records are inventoried. This approach is facilitated by the use of a common set of tools (e.g., databases) administered by a central point of contact. This option increases the knowledge of all of the Site's record series by the Records Management organization, resulting in more knowledgeable management of the records.

2.2 Organization Performed / Centrally Coordinated & Trained

When a large quantity of records are to be inventoried (e.g., the initial site records inventory) the Records Management organization may not have enough staff to efficiently conduct the inventories and interviews. The option to select a few individuals from the organization to be inventoried to assist in the inventory may be a way to complete the inventory in a timely fashion. The Records Management organization will perform some of the interviews and inventories, and be responsible for the initial training of the additional staff, consolidating the inventory data and performing quality checks of the data. Additional advantages of this option is that the organization's staff has an initial understanding of the record series being inventoried and that the results of the inventory have credibility, which may not be the case under the "Centrally Performed" option. Training of the organization's staff by the Records Management personnel has the dual benefit of increasing their knowledge of Records Management practices and requirements and establishing a basis for future work relationships. However, the total cost of the inventory under the "Organization Performed" option will be larger because of the additional need to train and quality check the work.

3. Inventory Team Staff

3.1 Site Records Management Staff

Where possible the site's permanent staff should be used to perform the inventory. These individuals will have a previous knowledge of the record series to be interviewed, which will facilitate the work. However, few organizations will have extra staff available to detach from their "normal" work to devote to conducting the inventory and additional staff will be required. Even if the bulk of the inventory project staff is augmented by other site staff or by contractors, some participation by the Records Management organization staff is valuable for this reason.

3.2 Supplemental Use of Organization Staff

As discussed above, use of the staff normally assigned to the organization whose records are being inventoried is a good way to supplement the inventory staff. These individuals should have previous experience in working with records, be thorough, and have good interviewing skills to be an asset to the inventory team. It is especially critical that they have no other duties other than supporting the inventory during the time their organization is being worked. Experience has been that organization staff is only effective for their organizations records; when the inventory is completed in the organization, a new set of supplemental staff must be selected and trained for the next organization's inventory.

3.3 Supplemental Use of Contractors

An alternate source of supplemental staff is the use of inventory-experienced contractors to either supplement the site Records Management staff or to lead the management of the project for the Records Management organization. The use of dedicated contractors to work with the site minimizes the training and administrative oversight and costs associated with using the inventoried organization's staff, since they can continue to inventory the site organizations without additional training. Experienced contractor staff will be able to relate previous experience to develop the most cost-effective approach to the inventory. Previously used tools (forms, databases, progress reporting charts, etc) will be available for adaption to the requirements of the new location.

3.4 Training of Inventory Staff

All staff assigned to the Inventory project shall receive training on the purpose, methods and tools used on the project. A written set of guidelines or procedures must be prepared to establish the methods and quality expectations for the staff. Depending on the experience of the staff, additional training may be provided on:

- interviewing techniques,
- record series identification,
- preparation of Inventory forms and SF-115,
- site organization, and
- federal records management processes.

4. Funding

4.1 Inventory Plan and Budget Projections

A detailed Inventory Plan is required to establish the scope of the records inventory, the schedule by organization, staffing requirements and sources, and the projected funding for the inventory project. Identification of the projected funding requirements, especially for multi-year projects, is critical to ensure that management has made the financial commitment to allow the project to succeed. The actual progress to the goals set for the inventory project can be measured and used annually to support continued funding for the succeeding years of the project.

The Inventory Plan should show the following actions:

- Time for the development of inventory project tools and procedures,
- Ramp-up at the beginning of the project for staffing and ramp-down at the end to allow time to roll-up the record series and prepare and submit record schedules,
- A schedule for the organizations to be inventoried, based on the number of employees and an anticipated quantity of record series created or maintained by that organization.
- Allowance for administrative support time for periodic status reports and updates, and
- Contingency for organizations whose Inventory must be deferred due to operational reasons and describe contingencies for organizations which decline to participate.

4.2 Site-funded Projects

Experience has shown that Site-funding for the records inventory from the administrative services budget is required to allow consistent staffing levels and work load per the Inventory Plan. Having the assured funding allows the Records Management organization to manage the organizations to be inventoried and the remaining time against the Plan requirements to produce a steady progress and uniform quality of work product.

4.3 Organization-funded Projects

A small number of DOE sites originally planned to require that the funding for the inventory of their records be paid by the organization that created the records. While this made sense in that the organization had an incentive to organize their records to complete the inventory in the shortest possible time, in practice the organizations were reluctant to allow any time at all on a records inventory. The organization's money was used to accomplish the organization's programmatic or technical responsibilities. The effort to schedule and fund the inventory required 50% of the time of the inventory team, and the variable workload caused periods of downtime for the Inventory Teams. This approach was more expensive in the long run.

5. Methods

5.1 Management Support

Visible support by management for the records inventory is essential to its success. This support must be displayed by approval of announcements of the Records Inventory, and the authorization of the appropriate policies and procedures by site management. Additional supporting announcements by Organization management when the inventory begins in that organization will help to gather the cooperation of the staff members who will be interviewed. Prompt endorsement of the work products by management at the completion of the inventory will also show support and acknowledgment of the value of the records inventory.

5.2 Interviews and Checklist

The primary work associated with the Inventory projects was devoted to interviewing knowledgeable staff members concerning the records created within the organization and in understanding their purpose and file organization. Because several sets of interviewers perform the interviews, a checklist, or similar means, could be used to ensure consistency in the data received. A sample checklist is provided as an attachment to this paper as Attachment 1. A Record Series Identification Form was prepared by the Interview team following the interview to record the inventoried records and significant attributes about the Series. Again, a sample Record Series Identification Form is also attached to this paper as Attachment 2. Both forms should be evaluated by the Inventory Team to establish their value and to adjust the forms to reflect the goals of the Inventory.

5.3 File Searches

After completion of the interviews, the files in the interviewee's office/work space and in the common organizational files may be searched. The purpose of this search would be to gather a sample of each record series identified during the interview and to remind the staff of any other record series that may have been missed during the interview. A sample of a representative (current) record could be attached to the Record Series Identification Form to assist in determining the retention and disposition times and in the roll-up.

5.4 Record Series Roll-Up

The Record Series Identification Forms are reviewed by the Inventory Team looking for Record Series that are similar. Similar Site-specific Record Series are combined (rolled-up) to minimize the total number of record series in use to make their management simpler. Essential attributes for rolling-up record series are identical retention durations, and similarity of purpose. For example, weekly project status reports from one organization are similar to another organization's status reports if the retention is identical.

Also, records which are sequentially created to complete an organization's objective, may be rolled into the same record series. For example, the paperwork to complete a procurement action that may consist of a request for quotation, a proposal, a purchase requisition, an evaluation and finally a signed contract, may be combined to create a single record series called "Procurement Records".

The Inventory Team should look for opportunities to roll-up records and record series across the various site organizations to simplify the record series determination decisions as well as filing and disposition practices.

6. Considerations

6.1 Classified Records

The Department of Energy creates and manages a large quantity of classified records. From an Inventory standpoint, classified records should be treated no differently than other federal records. [Handling differences related to access and distribution, storage and disposition, of course, do exist and must be considered.] However, care should be taken to avoid an inadvertent compromise of classified information during the inventory. Because the Record Series descriptions and any unique Records Disposition Schedules resulting from the Inventory are Unclassified the following precautions should be taken:

- Record inventory staff must have a security clearance equal to or exceeding the security classification of the records to be inventoried.
- Record series descriptions must be phrased using unclassified language. These
 descriptions must be reviewed by an Authorized Derivative Classifier to confirm the
 descriptions as unclassified.
- Record Series should not have mixed security levels, e.g., unclassified records should not be listed in a record series that also has Secret records. Any example records retained for use in the Record Series Descriptions must be sanitized to remove classified information.

6.2 Electronic Records

Various types of electronic records must be considered during the inventory. The first are those electronic records created in the performance of the creation of records in other media, for example, the word processing files used to create a report intended to be printed and distributed on paper. These electronic records should be considered in the record series describing the paper document and are typically retained only for the time before the record is being finalized and approved. After the expiration of the retention period shown in the retention schedule, they may be dispositioned even though the paper record is retained for a longer period.

The additional types of electronic record are those that receive periodic (even continuous) updates and changes. Examples of these electronic records are personnel information or property accountability databases or computer input/output files (data files) and program code. A decision must be made as to how often a records copy of these files must be made, and their retention durations. The retention decisions should be based on the frequency of changes made to the record, the criticality of the information and the pattern of changes. If, for example, the changes are made at one time during the month, a record copy should be made after that update. If the changes are made daily, a weekly or more frequent copy should be made if the information is highly significant. A separate Record Series Description and retention period should be made for these electronic records.

6.3 Tools

Many inventory projects found that it was essential to develop and maintain a database of the inventoried record series, to allow periodic status reports and to prepare statistics to be provided to management. The database was also used to create the SF-115 and other submittals to management. Initial information to be collected includes the record series name, and its description, office(s) creating the records, location of the files (both active and inactive) and the volume of the records. Later, information related to the retention of the records including the citation to the approved or pending submittal can be added. The database can be used to publish the sites record series to the rest of the organizations on the site either in a report or electronically on the LAN or site Intranet.

Once the database is designed, a form can be developed to be used to record the record series information. This form should include a place for the information to be gathered from the interviews and entered into the database. It may also include information that can assist in the retention evaluation of the record series. A sample "Record Series Identification Form" is shown in Attachment 2, which may be used as is or adapted for your inventory. Instead of manually completing the Form, some inventory projects provided laptop computers to the inventory team members with the database already installed for use during the interviews. Daily "data dumps" were made to the "central" or consolidated database to accumulate all inventory data for use in the roll-ups and retention evaluations.

6.4 Review for Commonality and Consistency (the Roll-Up)

The interview data and database are reviewed periodically during the inventory and at the completion of the interviews within an organization. The reviews are conducted to identify opportunities for "rolling-up" similar record series and for ensuring completeness. The reviews allow coordination of the work from the many interview teams within the organization and also coordinate similar record series within the total site. This review has been accomplished at various sites by a single individual supporting the interviewers or by the interviewers at the completion of the day. Retention durations are reviewed for consistency with other records' retentions and against the regulations cited in the Record series Description.

6.5 Organization Approvals

Upon completion of the interviews and database entry, the consolidated list of record series for the organization is printed and presented to that organization's management for review and approval. Approval is indicated by a signature and date on a cover sheet or other document as appropriate to meet site authentication requirements. This approval is maintained in the records of the Records Inventory Project.

6.6 Publishing the Results

Periodically during the Inventory, the list of record series identified during the project should be published and made available not only to the organization which created the records, but also to the remainder of the site. Techniques used to publish the data included a periodic mailing to the records management coordinators at the site with a record series listing from the database, and by making a list of the approved record series available on the Intranet or inventory project web site. Record series, whose retention determinations have not been approved by the DOE/HQ records management organization and NARA, should be included in the listing with a "(pending)" identification included.

6.7 Records Management Issue Resolution

Opportunities to assist the organization's records management program will occur during the interviews and inventory project. Time should be taken to discuss these issues with the organization's records management coordinator, if they can be completed quickly. Otherwise, the issues should be recorded and flagged to the Records Management Organization for follow-up independently of the Inventory. Items that may be completed quickly include those where a little bit of training would resolve the issue or explain a confusing point in a procedure. Longer term issues might include inadequate records storage space or organization-wide training in Records Management principles. These opportunities are ideal times to improve relationships with the customers of the Records Management Organization. A written report of the issues resolved or investigated can also prompt awareness by that organization's management of records practices within their organization.

7. Work Products

7.1 Records Volume by Location

A typical output of the Records Inventory is a listing of the Record Series for the site and the identification of the quantity of records within each Record Series. The listing of quantity is normally in cubic feet for hardcopy records sorted by the storage location. A separate quantity is usually provided for records in "active" storage (e.g., still within the organization's offices) and inactive storage (e.g., transferred to on-site records storage or to a Federal Records Storage Center). Electronic records are normally reported as the number of megabytes of record copies maintained in dedicated storage for Records Management.

7.2 Disposition Research

Establishment of the retention durations requires research into the requirements of all of the jurisdictions having cognizance of the record series. Thus, Federal requirements (NARA General Records Schedules, and DOE-specific Records Schedules) must be compared to similar State statutes and other contractor-specific Records Schedules to determine the longest and thus most restrictive retentions. All of the applicable requirements should be recorded so that if/when one of these requirements is changed, the Record series retention may be revised without additional basic research.

7.3 List of Record Series, Locations and Originating Organizations (File Plan)

A listing of the approved and pending Record series with their Retentions and Originating organizations provides the basis for the future management of the records for the site. This listing may be used as the basis for an Organization File Plan, if desired by the management, by adding the file location for the recordkeeping copy.

7.4 Submittal of SF-115's for Unscheduled Records

If, after completing the disposition research for a record series, no federal disposition requirements are identified, authorization to schedule the record series for disposition must be obtained from DOE/HQ and NARA. A SF-115, "Request for Records Disposition Authority", is prepared from the Record Series Inventory description and proposed Disposition. The SF-115 is submitted to the DOE/HQ Records Officer where it is reviewed and submitted to NARA for approval by the Archivist of the United States. No disposition of any of the records in this series may be made until the SF-115 is approved.

7.5 Management Reports

Periodic reports are submitted to the Records Management and Site Management during the Inventory project to provide status of the work and the budget expenditures. Information requested usually includes completion status (i.e., hours expended vs. projected hours and percent of organizations inventoried). Other requested information may include volumes of records inventoried and the total number of record series identified by the inventory.

Although not a management report per se, periodic (e.g., quarterly) "press releases" concerning the progress being made on the records inventory should be made to publicize the project. This publicity will assist in improving the perception of the Records Management Organization on site and in gaining support from organizations yet to be inventoried when their turn comes.

Information similar to the management reports discussed above are appropriate content for the press releases. Testimonials from satisfied organizations, when available, can also be good content for these "press releases".

8. Expected Progress

8.1 Initial Records Inventory

For planning purposes, the interviews conducted during the inventory may be estimated as a percentage of the total number of staff in the organization. A standard number of hours per interview may be used for estimation purposes. The interviews may be expected to require 3-6 hours each and the percentage of the staff to be interviewed may range from 15% to 30% to be sure of identifying all of the records. Additional staff time must be allowed for disposition research and roll-up work as well as the time for obtaining approvals of the record series listing from the inventoried organization's management. After the first quarter and again after the initial year's inventory, these estimate parameters can be evaluated and modified to reflect the actual conditions at the site.

8.2 Incremental Inventory Update

An inventory conducted after the initial inventory has been completed has a slightly different emphasis. An incremental inventory is used to identify any new Record Series created or managed by the organization and to update the quantities of records currently in active and in inactive storage. The estimate for these types of inventories will depend on the time since the last Inventory and the viability of the Records Management program. If the RM program has routinely solicited and received notification of new record series from the organizations and it has been a short time since the last inventory, the incremental inventory may require a few hours with the organization's RM Coordinator and Manager(s). If little effort has been put into maintaining the Record Series, updating the inventory could require considerably more effort. Estimates for the time required for an incremental inventory will require an assessment of the state of RM at the site.

9. Conclusion(s) / Benefits

The Records Inventory is much more than a bureaucratic exercise to identify the records created and managed by an organization. It is the foundation for the management of these records. From the Records Inventory, the organization obtains the accurate listing of the records to be used in establishing retrieval methods for the important information contained in the records and in meeting our obligations under the Federal Records Act. The major effort of a Records Inventory is only required once if these listings are maintained as new record series are created and destroyed.

Benefits from a successful Records Inventory include:

- Identifying the creation organizations for the site's records,
- Assisting in identifying record series to standardize retrievals.
- Predetermining the retention durations and authorities for site Record series,
- Allowing controlled destruction of appropriate records based on these durations,
- Minimizing the obligation to retain records and incurring the resulting storage costs and potential costs of discovery in the event of litigation,
- Opportunity to provide one-on-one assistance to Records Management Coordinators in the implementation of their organization's records management program,
- Conformance to the requirements of the Federal Records Act.

Attachment 1 Sample Interview Checklist

| {Site Name} RECORDS INVENTORY CHECKLIST | | | | | | | | | | |
|--|--------------------------------|----------------|--|--|--|--|--|--|--|--|
| Organization: | OrganizationName: | Date: | | | | | | | | |
| Contact: | Phone Number: | Fax Number: | | | | | | | | |
| Interviewer: | | | | | | | | | | |
| Explain General Purpose of Inventory to Organization | | | | | | | | | | |
| Gather Gen | eral Organization Information: | | | | | | | | | |
| <u>Organizations</u> | Purpose: | | | | | | | | | |
| Types of Records Created and Security Classification: | | | | | | | | | | |
| Obtain Current Organization Chart: | | | | | | | | | | |
| View the Organization's Records Storage Areas | | | | | | | | | | |
| Explain which records are currently held by the Records Management Organization: | | | | | | | | | | |
| | | | | | | | | | | |
| | | Completed by: | | | | | | | | |
| | | Date: | | | | | | | | |

Attachment 2 Sample Record Series Identification Form

| | RECORD SERIES IDENTIFICATION FORM | | | | | | | | | | | |
|---------------------------------------|------------------------------------|--------------------------|------------------------------|----------------------------|---------------------|---|----|--|--|--|--|--|
| {Site Name} Records Inventory Project | | | | | | | | | | | | |
| Division: | | | | | Date: | | | | | | | |
| Group: | | | | | Records ID: | | | | | | | |
| Record Holder: | | | | | Record Dates: | | | | | | | |
| Record Specialist: | | | | | Record Location: | | | | | | | |
| Records Media: | □ Paper □ Electronic | □ Microform □ Disk/Tape | □ Photographs □ Audio/Visual | □ Radiographs □ Other | Record Volume: | | | | | | | |
| Records Value: | ☐ Epidemiological | □ Emergency Operating | □ Quality Assurance | □ Legal & Financial Rights | | | | | | | | |
| Reco | ord Series Title: | | | | | _ | | | | | | |
| Record Series Description: | | | | | | | | | | | | |
| Disposition Authority: | | | Disposition: | | | | | | | | | |
| Recomr | Recommended Transfer Instructions: | | | | | | | | | | | |
| ORGANIZATIONAL CONCURRENCE: | | | FOR INVENTORY | PROJECT USE ONLY | | | | | | | | |
| Approval: | | | | Schedule Code: | | | | | | | | |
| Title: | | , | | Draft Schedule: | □ Yes | | No | | | | | |
| Date: | | | | Draft Citation: | | | | | | | | |
| | | | | Roll-up | □ Yes | _ | No | | | | | |
| | | J | <i>l</i> ' | Office of Record: | □ Yes | | No | | | | | |